

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

_____)	
UNITED STATES OF AMERICA)	Case No. 1:12CR3
)	
v.)	
)	
KIM DOTCOM, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

CONSENT MOTION FOR EXTENSION OF TIME

The United States of America, by and through its undersigned attorneys, hereby moves the Court to extend the deadline for the filing of the briefs requested in the Court's October 2, 2012 Order by fourteen days, to October 30, 2012. In support of the motion the United States declares as follows:

1. On October 2, 2012, this Court issued an Order directing the government and Kyle Goodwin to file briefs regarding the scope and format of a hearing that would address the applicability of Federal Rule of Criminal Procedure 41 to Mr. Goodwin. The Court gave the parties fourteen days to file their papers.

2. Due to the complexity of the issues surrounding this litigation, as well as scheduling conflicts with government counsel, the government hereby moves for an additional fourteen days for the parties to respond to the Court's October 2, 2012 Order.

3. The government contacted counsel for Mr. Goodwin regarding this motion, and opposing counsel consents to the extension of the deadline. A proposed order is attached to this motion.

Respectfully submitted,

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United States Attorney

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of June, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF, which will then send a notification of such filing (NEF) to:

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